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Before the  
Federal Communications Commission  
Washington, D.C. 20554  
FCC Docket No. 93-154  
PR Docket No. 93-85

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In the Matter of

) FCC Docket No. 93-141

) PR Docket No. 93-61

Amendment of Part 90 of the  
Commission's Rules to Finalize  
Rules Concerning Automatic  
Vehicle Monitoring Systems

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)  
)

June 21, 1993

To: The Federal Communications Commission

COMMENTS OF THE OREGON REGION RELAY COUNCIL

- 1 These comments are submitted by the Oregon Region Relay Council (ORRC), the local coordinator for the State of Oregon and south west Washington. The ORRC coordinates amateur radio Packet frequencies with the assistance of SOAPRA, OPRA, OPEN and other packet network associations. The ORRC also coordinates AM, FM, VSB, and ACSSB, phone and image station frequencies.

- 2 **Summary**

In this filing the ORRC opposes the expansion of objects to be located, and questions the need to enlarge the older and spectrum inefficient AVM technologies. We support Amateur Radio Service sharing of 902-928 and are inclined to be supportive of common carrier authority for AVM. We contend that the intelligent highway has been provided by other technology, and that advanced, spectrum efficient AVM technologies should be employed.

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List A B C D E

**3 Location of any object similar to previously rejected proposals**

While some expansion of the types of objects to be located may be reasonable, the open ended nature of the proposed rules produces undesirable consequences. The proposed changes would create new services, substantially identical to services previously rejected

**6 Supportive of common carrier authority**

We are inclined to be supportive of common carrier authority for AVM systems. We feel this is reasonable authority to allow effective utilization of the technology, provided sufficient safeguards are included to prevent over taxing the crowded 902-928 band.

**7 Advanced technologies more effective**

While we believe there is a need for vehicle locating systems, we are concerned that the technology being advanced in this docket is obsolete and wasteful of spectrum. As stated by the Commission, the wide-band technologies being addressed in this NPRM date from August of 1968, prior to the existence of the GPS system. With the availability of GPS, vehicles may easily report their precise position using narrow bandwidth systems. Such arrangements provide much greater spectrum efficiency and consume smaller bandwidth, thereby allowing larger numbers of vehicles to be monitored. While the passive ranging system does allow for minimal vehicle equipment, the advancement of GPS technology, the declining cost of GPS receivers, and existing computerized navigation equipment in the vehicle render this advantage moot.

**8 2450-2483.5 MHz more appropriate for vehicle tagging**

The passive tagging of cargo trailers (vehicle tagging) is an application in which minimal vehicle equipment remains desirable. We conclude that applications of this type would

**10 Local Amateur Radio Service coordinators will assist sharing**

Coordination to prevent interference is the fundamental purpose of Amateur radio service (ARS) frequency coordinators. Sharing of the 902-928 MHz band by the ARS can be accomplished with the assistance of these coordinators. ARS frequency coordinators are ready and willing to assist the AVM service. Local frequency coordinators are experienced in the propagation characteristics, coverage area and protection requirements in the various geographical areas of the country.

**10 Exclusive segment**

As a sharing partner in the 902-928 MHz band, the amateur radio service has some needs that can best be satisfied by a small segment allocated exclusively to the amateur service. These activities, such as propagation studies and weak signal work, provide valuable information useful for the advancement of the radio art. We advocate the advancement of the ARS to co-primary status for at least a small segment of 902-928 band to encourage continuation of these activities. Sharing of the remaining segments can be accomplished as outlined above.

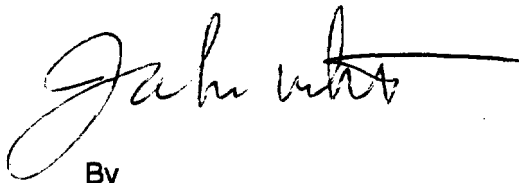
**11 Capitol investment**

We also note that the high capital investments required for wide-band systems will limit their implementation to only the most lucrative metropolitan markets which will make these expensive systems profitable. This suggests the existence of extensive opportunities for sharing of this band by the amateur radio service.

**11 Conclusion**

For these reasons and other reasons, we suggest the widest possible latitude be provided to the amateur radio service to support spectrum sharing for this band and request the Commission structure the rules to accommodate the ARS needs.

Respectfully submitted,  
The Oregon Region Relay Council

A handwritten signature in black ink, appearing to read "John White", with a long horizontal flourish extending to the right.

By  
John White, K7RUN  
Chair, ORRC